

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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INSPIRED PURSUITS, LLC,  
QUALTIM, INC., CENTER FOR  
BUILDING INNOVATION, LLC,  
DRJ ENGINEERING, LLC, KIRK  
GRUNDAHL, and SUZANNE GRUNDAHL,

Plaintiffs,

v.

Case No. 25-CV-75

PARAGON COMPONENT SYSTEMS, LLC,  
JOHN HOLLAND, JAMES HOLLAND,  
CLEARSPAN COMPONENTS, LLC, ANDREW  
EWIN, DAVID REED, SCOTT HOELSMA,  
SETH DUNCAN, MICHAEL PITTS, AVERY  
RADMACHER, NATHAN BIEREMA, JEREMY  
BIEREMA, ROB EASON, and THE ESTATE OF  
DANIEL HOLLAND EX REL. SPECIAL  
EXECUTOR MARVIN B. SPEED,

Defendants.

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**DECLARATION OF TAMAR B. KELBER IN SUPPORT OF REQUEST  
FOR RELIEF FROM OBLIGATION TO FILE COPYRIGHT REPORT**

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1. I am an attorney with the law firm Gass Turek LLC and am one of the attorneys of record representing Defendants Paragon Component Systems, LLC ("Paragon") and John Holland in the above-captioned matter. I make this declaration in support of Paragon's Request for Relief from the Obligation to File a Copyright Report.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the standard form for a Report on the Filing or Determination of an Action or Appeal Regarding Copyright.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the complaint filed in *Paragon Component Sys., LLC v. Qualtim, Inc., et al.*, Case No. 1-24-cv-00246-CEA-CHS (E.D. Tenn. July 23, 2024) (the “Tennessee Action”).

4. Attached hereto as **Exhibit 3** is a true and correct copy of the docket entry of the Notice of Failure to File Copyright Report issued by the court in the Tennessee Action on July 24, 2024.

5. Attached hereto as **Exhibit 4** is a true and correct copy of Paragon’s Request for Relief from Obligation to File Plaintiff’s Copyright Report filed in the Tennessee Action on July 26, 2024.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the Order Relieving Plaintiff from Obligation to File Copyright Report entered by the court in the Tennessee Action on August 26, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 7<sup>th</sup> day of February, 2025.

s/ Tamar B. Kelber  
Tamar B. Kelber, SBN 1101802